

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

In re POLYURETHANE FOAM ANTITRUST LITIGATION	)	
This document relates to:	)	MDL Docket No. 2196
ALL CASES	)	Index No. 10-MD-2196 (JZ)
	)	
	)	
	)	

**NOTICE OF DEPOSITION**

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 30, the Direct Purchaser (Class) Plaintiffs, the Direct Action Plaintiffs, and the Indirect Purchaser (Class) Plaintiffs (“Plaintiffs”) will take a deposition of **Doug Dolphin**, formerly of Foamex Canada, at **Victory Verbatim, 222 Bay Street, Suite 900, Toronto ON M5K 1H6** on **January 28, 2014** at **10:00 a.m. E.S.T.** The testimony will be recorded by stenographic and auditory means by a person authorized to administer oaths.

Pursuant to the Court’s order at the October 24, 2012 hearing (ECF No. 436 at 77–78), Plaintiffs provide a brief description of the deponent, to extent allowed by the protective order in this matter, as follows: **former Foamex Canada employee.**

Dated: January 28, 2014

/s/ William A. Isaacson  
William A. Isaacson  
BOIES, SCHILLER & FLEXNER LLP  
5301 Wisconsin Avenue, NW  
Washington, DC 20015  
Phone: 202-237-5607  
Fax: 202-237-6131

/s/ Stephen R. Neuwirth  
Stephen R. Neuwirth  
QUINN EMANUEL URQUHART  
& SULLIVAN, LLP  
51 Madison Avenue, 22nd Floor  
New York, NY 10010  
Phone: 212-849-7165  
Fax: 212-849-7100

***Interim Co-Lead Counsel for Direct Purchaser (Class) Plaintiffs***

/s/ Marvin A. Miller  
Marvin A. Miller  
MILLER LAW LLC  
115 South LaSalle Street, Suite 2910  
Chicago, IL 60603  
Phone: 312-332-3400  
Fax: 312-676-2676

***Interim Lead Counsel for Indirect Purchaser Class Plaintiffs***

/s/ William J. Blechman  
William J. Blechman  
KENNY NACHWALTER, P.A.  
201 South Biscayne Blvd., Suite 1100  
Miami, FL 33131  
Phone: 305-373-1000  
Fax: 305-372-1861

***Liaison Counsel for Direct Action Plaintiffs***